

LAW OFFICE  
 FILED  
 DISTRICT COURT  
 PAUL F. NEWHOUSE  
 JUDGE OF DISTRICT COURT

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PAUL F. NEWHOUSE

2001 SEP -4 P 3:05  
 August 31, 2001

CALLISTA M. FREEDMAN

CLERK'S OFFICE  
 AT BALTIMORE  
 DEPUTY

Honorable Benson E. Legg  
 U.S. District Court  
 for the District of Maryland  
 Garmatz Federal Courthouse  
 101 W. Lombard St  
 Baltimore MD 21201

RE: Ewell v. Ventiv Health U.S. Sales, Inc., et al.  
 Case No.: L-00-3720

Dear Judge Legg:

With the consent of counsel for Ventiv Health U.S. Sales, Inc., I am writing to make a joint request to extend discovery in the above referenced matter. The parties have diligently conducted discovery in this matter. Unfortunately, due to the work schedules and summer vacations of counsel for both parties, no depositions have been scheduled to take place before the current discovery end date of September 4, 2001. The schedules for possible deponents during the past summer have increased the difficulties with arranging agreeable dates for the depositions. In addition, Ventiv Health U.S. Sales, Inc., although presently working on answers to interrogatories and production of documents, has not yet responded to Plaintiff's discovery requests. Plaintiff's discovery requests were detailed and require the production of a fair amount of documents. It is anticipated that Ventiv will provide discovery responses shortly.

In order to arrange depositions and complete discovery in this matter, both parties request an extension of the discovery period and other deadlines in the current scheduling order as follows:

Discovery deadline: submission of status report	November 5, 2001
<del>Requests for Admissions</del>	<del>November 12, 2001</del>
Dispositive Pretrial motions deadline	December 5, 2001

Thank you for your consideration of this matter.

Sincerely,

*Callista M. Freedman*  
 Callista M. Freedman

cc: Maryann Cohea, Esquire  
 Attorney for Defendant Ventiv Health U.S. Sales, Inc.

*Approved as modified*  
 MOTION " " this 4 day  
 of Sept 20 01.  
*Bless*  
 BENSON EVERETT LEGG, U.S.D.J.